

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

*Bakahityar Kamardinova et al. v. Islamic Republic of Iran, No. 1:18-cv-05339 (GBD) (SN)*

Jerry S. Goldman, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Kamardinova* plaintiffs in the above-captioned litigation, and I submit this declaration in support of the Motion for Corrections to Order of Judgment against the Islamic Republic of Iran (“Iran”) on behalf of Amanda Castrillon.

2. The source of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter, my firm’s representation of the *Kamardinova* plaintiffs in connection with the September 11<sup>th</sup> litigation against the terror defendants, other court records relating to the multi-district litigation to which the *Kamardinova* plaintiffs are parties, conversations had with family members to the *Kamardinova* plaintiffs, file records and conversations with counsel to other September 11<sup>th</sup> plaintiffs. Any matters about which I lack personal knowledge are asserted herein upon information and belief.

3. This Declaration and the attached Proposed Order and modified Exhibit are submitted in light of notice we received that an individual plaintiff included in our August 2, 2019 Motion for Final Damages Judgment (ECF 4731), which was granted on August 20, 2019 (ECF 4897), was not a United States national on September 11, 2001.

4. Plaintiffs' counsel has determined that United States citizenship documentation has not been obtained that would render Ms. Castrillon eligible for judgment pursuant to 28 U.S.C. § 1605A which limits relief in this situation to "a national of the United States . . . at the time the act . . . occurred." 28 U.S.C. § 1605A(a)(2)(A)(ii)(I).

5. Given that no such documentation has yet been obtained for Ms. Castrillon, we ask that the judgment for Amanda Castrillon be vacated and that the Clerk remove Amanda Castrillon from the Judgment Index as she is not entitled to the relief that was awarded at the present time subject to her furnishing to counsel sufficient citizenship documentation rendering her eligible for a judgment pursuant to 28 U.S.C. § 1605A.

Dated: New York, New York  
November 12, 2019

/s/ Jerry S. Goldman  
Jerry S. Goldman, Esq.